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NEW JERSEY BOARD OF  
CHIROPRACTIC EXAMINERS

THEODORE W. DAUNNO, ESQ.  
1033 Clifton Avenue  
Clifton, New Jersey 07013  
(973) 472-0202  
Attorney for Respondent, Alan L. Marcus, D.C.

STATE OF NEW JERSEY DEPARTMENT OF  
: LAW & PUBLIC SAFETY DIVISION OF  
IN THE MATTER OF THE SUSPENSION: CONSUMER AFFAIRS STATE BOARD OF  
OR REVOCATION OF THE LICENSE OF: CHIROPRACTIC EXAMINERS  
: DOCKET NO.  
ALAN L. MARCUS, D.C., :  
LICENSE NO. MC1604 :  
: **Administrative Action**  
TO PRACTICE CHIROPRACTIC IN THE: **ANSWER TO VERIFIED COMPLAINT**  
STATE OF NEW JERSEY :  
:

THEODORE W. DAUNNO, Attorney-at-Law of the State of New  
Jersey, with offices located at 1033 Clifton Avenue, in the City of  
Clifton, County of Passaic and State of New Jersey, by way of  
Answer on behalf of Alan L. Marcus, D.C., says:

GENERAL ALLEGATIONS

1. Respondent admits the allegations contained in Paragraph  
Nos. 1, 2 and 3 of the General Allegations.
2. Respondent denies the allegations contained in Paragraph  
Nos. 4 and 5 of the General Allegations.

COUNT I

Respondent denies each and every allegation contained in  
Paragraph Nos. 1 through 23 of Count I.

COUNT II

Respondent denies each and every allegation contained in Paragraph Nos. 1 through 20 of Count II.

COUNT III

Respondent denies each and every allegation contained in Paragraph Nos. 1 through 15 of Count III.

COUNT IV

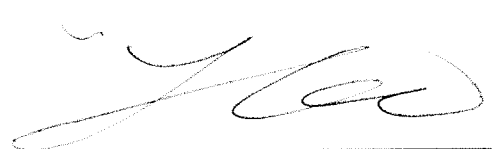
Respondent denies each and every allegation contained in Paragraph Nos. 1 through 11 of Count IV.

COUNT V

Respondent denies each and every allegation contained in Paragraph Nos. 1 through 8 of Count V.

WHEREFORE, Respondent demands judgment dismissing Complainant's Verified Complaint.

Dated: December 29, 1998



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THEODORE W. DAUNNO  
Attorney for Respondent,  
Alan L. Marcus, D.C.

CERTIFICATION

I hereby certify that an original and one copy of the within Answer to Verified Complaint have been forwarded to the New Jersey Board of Chiropractic Examiners, 124 Halsey Street, 6th Floor, Newark, NJ, 07101, Attention: Kevin Earle, Executive Director, via certified mail return receipt requested; and to the Attorney General of New Jersey, Division of Law, 121 Halsey Street, P.O. Box 45029, Newark, NJ. 07101, Attention: Beatriz Valera-Schutz, D.A.G., via certified mail, return receipt requested.

Dated: December 29, 1998



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THEODORE W. DAUNNO  
Attorney for Respondent,  
Alan L. Marcus, D.C.